



## Department of Energy

Idaho Operations Office  
850 Energy Drive  
Idaho Falls, Idaho 83401-1563

August 20, 2003

Mr. Wayne Pierre, Team Leader  
Environmental Cleanup Office  
U.S. Environmental Protection Agency  
Region X  
1200 Sixth Avenue  
Seattle, Washington 98101

Mr. Dean Nygard, Site Remediation Manager  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, Idaho 83706

**SUBJECT:** Transmittal of the Draft V-Tanks Record of Decision Amendment and Supporting Engineering Design Files for Operable Unit 1-10, Waste Area Group 1, at Test Area North - (EM-ER-03-206)

Dear Mr. Pierre and Mr. Nygard:

The *Record of Decision Amendment for the V-Tanks (TSF-09 and TSF-18) at Test Area North, Operable Unit 1-10*, (DOE/ID-10682 Amendment, Revision C, August 2003 DRAFT) is enclosed for your review. The amendment changes the original V-Tanks remedy to Soil and Tank Removal, Ex Situ Chemical Oxidation/Reduction with Stabilization of Tanks Contents, and Disposal. The tank contents will be removed, treated using either chemical oxidation or reduction, be stabilized, and then be disposed of at the INEEL CERCLA Disposal Facility (ICDF) or other approved facility. Finally, as addressed in the original 1999 Record of Decision (ROD), the surrounding soil, tanks, and debris will be removed and disposed of at the ICDF or other approved facility.

The following draft engineering design files are also included for review since they are referenced in and support the V-Tanks ROD Amendment:

*EDF-3868, V-Tank Analytical Data – Calculated Averages and Upper Confidence Limits*

*EDF-3077, Risk-Based Approach for Management of PCB Remediation Waste from V-Tanks*

*EDF-3948, Use of V-1, V-2, and V-3 for Storing, Blending, and Accumulating Waste During Remediation of the V-Tanks*

The cost estimate in Table 8-1 of the ROD Amendment is a compilation of costs from an estimate in the *Conceptual Design Report for Ex Situ Chemical Oxidation/Reduction and Stabilization of the V-Tanks at Waste Area Group 1, Operable Unit 1-10*, (INEEL/EXT-03-00438, June 2003) and from cost estimates prepared during FY 2004 detailed work planning. To support the ROD Amendment a stand-alone ROD Amendment estimate is currently being

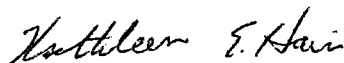
prepared. Based on this new estimate, Table 8-1 will be updated and provided for review before the draft final ROD Amendment submitted. After the update, Table 8-1 will reflect further scope and estimate development since the comparative estimates were prepared and presented in the April 2003 V-Tanks New Proposed Plan for each of the technologies.

Responses to public and stakeholder comments on the V-Tanks New Proposed Plan are addressed in Part III, Section 13 of the ROD Amendment. In addition, IDEQ comments on preliminary draft ROD Amendment language are addressed in the attached comment resolution forms. As discussed in the August 14, agency conference call, these comments will be resolved during the ROD Amendment review and comment period.

Per earlier agency discussion, it was agreed that the ROD Amendment should consider public comments on the V-Tanks Closure Plan that are received by IDEQ. We understand that only one comment was received by IDEQ. We also understand that IDEQ intends to address the comment as not being relevant to the closure plan since the comment was related to remedy selection and was not a comment received during the V-Tanks Proposed Plan public comment period. Therefore, there are no comments on the V-Tanks Closure Plan that affect the V-Tanks ROD Amendment.

The V-Tanks ROD Amendment is identified as a primary document in the Federal Facility Agreement and Consent Order (FFA/CO). Based on the FFA/CO established 45-calendar day review period, comments are requested from the EPA and IDEQ by October 6, 2003. Please contact me at (208) 526-4392 or Mark Shaw at (208) 526-6442 with any questions.

Sincerely,



Kathleen E. Hain, Lead  
Environmental Restoration Program

Enclosures

cc: C. Cody, DEQ, 1410 N. Hilton, Boise, ID 83706  
M. Wilkening, EPA Region X, Idaho Ops Office, 1435 N. Orchard St., Boise, ID 83706